

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMNESTY INTERNATIONAL USA; GLOBAL FUND FOR WOMEN; GLOBAL RIGHTS; HUMAN RIGHTS WATCH; INTERNATIONAL CRIMINAL DEFENSE ATTORNEYS ASSOCIATION; THE NATION MAGAZINE; PEN AMERICAN CENTER; SERVICE EMPLOYEES INTERNATIONAL UNION; WASHINGTON OFFICE ON LATIN AMERICA; DANIEL N. ARSHACK; DAVID NEVIN; SCOTT MCKAY; and SYLVIA ROYCE,

Plaintiffs,

v.

JOHN M. McCONNELL, in his official capacity as Director of National Intelligence; LT. GEN. KEITH B. ALEXANDER, in his official capacity as Director of the National Security Agency and Chief of the Central Security Service; and MICHAEL B. MUKASEY, in his official capacity as Attorney General of the United States,

Defendants.

**PLAINTIFFS' UNOPPOSED
MOTION FOR LEAVE TO
EXCEED PAGE LIMITATIONS
CONTAINED IN RULE 2(C)**

Case No. 08 Civ. 6259 (JGK)

ECF CASE

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO
EXCEED PAGE LIMITATIONS CONTAINED IN RULE 2(C)**

Plaintiffs respectfully seek leave to exceed the page limitations prescribed by Rule 2(c) of this Court's Individual Practices when briefing their motion for summary judgment to be filed on September 12, 2008.

Rule 2(C) specifies that a memorandum of law in support of a motion shall be limited to 25 pages. While plaintiffs understand that voluminous briefing can be a burden to the Court, plaintiffs believe that this case raises extraordinarily complex issues of law and that an extension of the customary page limit will facilitate the Court's consideration of the issues and promote the interests of justice. Accordingly, plaintiffs respectfully request that the page limit applicable to

their memorandum in support of summary judgment be extended to 60 pages.

Tony Coppolino, counsel for defendants, has informed plaintiffs that defendants do not oppose the Court's granting of this motion but request (with plaintiffs' consent) that the Court allow defendants 60 pages for their opposition and cross-motion.

Respectfully submitted,

/s/ Jameel Jaffer

JAMEEL JAFFER (JJ-4653)
MELISSA GOODMAN (MG-7844)
L. DANIELLE TULLY (DT-0509)
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Ph: (212) 549-2500
Fax: (212) 549-2583
E-mail: jjaffer@aclu.org

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION, by
CHRISTOPHER DUNN (CD-3991)
ARTHUR N. EISENBERG (AE-2012)
New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor
New York, NY 10004

September 4, 2008